

# ENVIRONMENTAL MANAGEMENT PLAN FOR THE PROPOSED TOWNSHIP ESTABLISHMENT ON PORTIONS 148 AND 167 OF THE FARM TOWNLANDS OF GOBABIS NO. 114, GOBABIS, OMAHEKE REGION



## ENVIRONMENTAL MANAGEMENT PLAN

**FEBRUARY 2021**



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PROJECT TITLE

*TOWNSHIP ESTABLISHMENT IN GOBABIS*

TITLE OF THE REPORT: ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL  
MANAGEMENT PLAN

**Proposed Environmental Impact Assessment for the Proposed Township Establishment on Portion  
148 & 167 of the Farm Townlands of Gobabis No. 114, Omaheke Region**

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**FINAL ENVIRONMENTAL MANAGEMENT PLAN**

**MARCH 2021**

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## 1. INTRODUCTION

Gobabis Municipality & the Developers (Block Construction & Stanley Griffiths) is in the process of establishing a township on Portions 148 and 167 of the Remainder of Gobabis Town and Townlands No.114, which is under consideration for the residential development and is approximately 67.6214 hectares. The ownership of this portion vests in the Gobabis Municipality who initiated the process towards the establishment of the township Gobabis by request of the Developers.

The Gobabis Municipality is experiencing a major backlog in the provision of middle-income housing for those who are dreaming of living in their own houses one day.

This document details the Environmental Management Plan (EMP) as informed by the Environmental Impact Assessment (EIA) conducted for these Townships Establishment. An EMP is a control framework for implementing the management actions described in an EIA. This EMP has been established to ensure that the project complies with the Namibian Environmental Management Act (No. 7 of 2007).

**This plan describes the management actions to be implemented during the following phases of this project:**

**Table 1: Phases of the Project**

<b>Planning &amp; Design</b>	The period, prior to the drafting of construction tender documents, during which preliminary legislative and administrative arrangements, necessary before any erven are sold, are made and detailed engineering designs/drawings are carried out
<b>Construction</b>	The period during which the services infrastructure will be constructed to service the various erven within the subdivided townships.
<b>Operations</b>	The period during which the services infrastructure will be fully functional
<b>Decommissioning</b>	The period during which a particular activity is decommissioned and the associated infrastructure is demolished/decommissioned

In addition to detailing specific management actions throughout the life cycle of the project, this EMP also describes the roles and responsibilities of those who are to administer this plan.

The commitments described here form part of the Environmental Clearance Certificate (ECC) (also known as the environmental contract) between the PPP and the state, as represented by the Ministry of Environment and Tourism (MET). Non-compliance is considered illegal and may have legal consequences. The amendment, transfer or renewal of the ECC should be communicated to the Environmental Commissioner as stipulated in the Environmental Management Act (EMA) of 2007 (S 39-42) as well as any changes to this EMP.

## **2. RESPONSIBILITIES OF PARTIES**

The responsibility for the implementation of the EMP ultimately lies with the Gobabis Municipality & Block Construction & Stanley Griffiths who are responsible for the eventual operation of the project. The implementation of this EMP requires the involvement of several stakeholders, each fulfilling a different but vital role to ensure sound environmental management during each phase of the project. The GM should appoint an Employer's Representative (ER) to oversee all aspects of the project (including all contracts for work outsourced) – one for the construction phase and one for the operational phases (both of these positions may be assigned to one person). The ER will in turn appoint an Environmental Control Officer (ECO) to oversee the implementation of the whole EMP. The various responsibilities of each party are discussed below:

### **2.1 Employer's representative**

The ER is appointed by the GM to manage all contracts for work/services that are outsourced during the construction, operations and maintenance and decommissioning phases. This position may be filled by any competent member of the Town Council's technical staff member.

Any official communication regarding work agreements is delivered through this person.

The ER should with the commencement of the project appoint a competent ECO who will represent the GM on-site.

The ER shall assist the ECO where necessary and will ensure that the necessary environmental authorizations and permits have been obtained by the Contractor;

The ER should assist the Contractor in finding environmentally responsible solutions to problems with input from the ECO where necessary;

ER should order the removal of person(s) and/or equipment not complying with the EMP;

The ER should issue fines for transgression of site rules and penalties for contravention of the EMP;  
and

Provide input into the ECO's ongoing internal review of the EMP and submit reviewed report on a  
monthly basis to the GM

## **2.2 Environmental control officer**

A competent environmental control officer should be appointed by the ER to fulfil this role as the GM's  
representative to monitor and review the on-site environmental management and implementation of the  
EMP by the Contractor.

If no ECO is appointed the duties of the ECO fall upon the ER.

The ECO should assist the ER in ensuring that the necessary environmental authorizations and permits  
have been obtained;

The ECO should maintain open and direct lines of communication between the ER, GM, Contractor, and  
I&APs with regard to environmental matters;

The ECO should carry out monthly site inspection of the construction area with regard to compliance  
with the EMP should be carried out

The ECO should monitor and verify adherence to the EMP (audit the implementation of the EMP) and  
verify that environmental impacts are kept to a minimum;

The ECO should take appropriate action if the specifications of the EMP are not adhered to and assist  
the Contractor in finding environmentally responsible solutions to problems;

The ECO should carry out monthly inspection to verify whether or not all new personnel coming onto  
site receive environmental awareness training

The ECO should advise on the removal of person(s) and/or equipment not complying with the  
specifications of the EMP via the ER and recommend the issuing of fines for transgressions of site rules  
and penalties for contraventions of the EMP;

The ECO should undertake a continual review of the EMP and recommending additions and/or changes  
to the document when deem necessary.

Copies of the Environmental Management Plan Administration should be kept at the site office and should be distributed to all senior staff members, including those of the contractors

### 2.3 Contractor

The Contractor shall be responsible for the adherence, compliance and implementation of the EMP, onsite monitoring and evaluation of the EMP;

In order to ensure sound environmental management, the relevant sections of this EMP should be included in all contracts of work outsourced thus legally binding to all appointed contractors;

All contractors shall ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers and newcomers receive an induction presentation on the importance and implications of the EMP;

Ensure that all staff members, subcontractors and suppliers have a comprehensive understanding of the EMP and adhere to the provision for the duration of the construction phase;

The presentation should be conducted, as far as is possible, in the employees' language of choice.

The Contractor should keep records of all environmental training sessions, including names, dates and the information presented

It is recommended that all principles contained in this EMP apply to all construction activities and operation phase of the project as indicated in the table below of which the GM is responsible for:

**Table 2: Principles of Construction and Operational Phases**

Construction Phase	Operation Phase
<ul style="list-style-type: none"> <li>• Ensure that all identified environmental impacts are managed in accordance with EMP</li> <li>• Ensure that all monitoring and compliance auditing occurs in line with the EMP</li> <li>• Ensure that the natural environment is rehabilitated to its natural environment or</li> </ul>	<ul style="list-style-type: none"> <li>• The GM should be responsible for the environmental performance of the operational performance</li> <li>• Identify, document and keep up to date the responsibilities and authority of all the GM technical staff</li> </ul>

<p>existing land use practices as possible</p>	<ul style="list-style-type: none"> <li>• Ensure all technical staff members understand their duties and responsibilities relating to the EMP</li> <li>• Establish an applicable internal disciplinary system for no-compliance.</li> </ul>
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### 3. PLANNING AND DESIGN OF MANAGEMENT PLAN

It is vital to emphasize the importance of including this management plan in the tender documentation for the infrastructural development to be given to the engineer and or the contractor.

The following section of the EMP details the various management processes, from where the processes are currently concerning the effective management of all construction and operational areas.

The provisions detailed in the EMP are enforceable once the township establishment is officially gazetted (proclamation of Portion 148 and 167 of the Remainder of Gobabis Town and Townlands No.114, Gobabis). Together with the conditions of establishment and the Zoning /Town Planning Scheme, these provisions should inform and guide future residential activity in this extension.

#### 3.1 LEGISLATIVE FRAMEWORK

The EIA is undertaken in terms of Namibia’s Environmental Management Act No. 7 of 2007 and the Environmental Assessment Policy of 1995 which stipulates the activities that have significant impacts on the environment. Listed activities require authorization from the Ministry of Environment and Tourism. Section 32 of the Environmental Management Act requires that an application for an environmental clearance certificate be made for the listed activities of which the townships establishment is one such listed activity.

The following table is indicative of the legislations that are relevant to this project:

**Table 3: Legal provisions applicable at various phases throughout the project lifecycle**

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS	CONTACT PERSON



<b>Archaeology</b>	National Heritage Act 27 of 2004	Apply for a permit to the National Heritage Council in order to carry out works or activities in a protected place (S 48).	Rev Salomon April Tel: (+264-61) 244 375/ 385/594
<b>Atmosphere Pollution</b>	Atmosphere Pollution Prevention ordinance of 1976	Prevent pollution of the atmosphere. Prescribed steps to be taken for any activity which is liable to cause any nuisance to persons residing in the vicinity or to cause dust pollution.	Dr Freddy Sikabongo/ Ms Saima Angula Tel: (+264-61) 284 2717
<b>Environmental Assessment</b>	Environmental Management Act 7 of 2007 EIA Regulations (EIAR) GN 57/2007 (GG 3812)	The amendment, transfer or renewal of an Environmental Clearance Certificate needs to be communicated to and receive approval from the Environmental Commissioner (EIAR, S 39-42). Requirements regarding the content of an Environmental Management Plan (EMP) (EIAR, S 8(j))	Ms Saima Angula Tel: (+264-61) 284 2717
<b>Forestry</b>	Forest Act 12 of 2001	Protected tree species and any vegetation within 100m from a watercourse may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.	Tel: (+264-61) 2842111 Fax: (+264-61) 229936
<b>Labour</b>	Labour Act (LA) 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Procedures regarding the presence of hazardous substances on site (HSR, S 176-195). Appoint a Safety Officer (HSR, S 6). All construction workers to participate in regularly scheduled environmental and safety induction (HSR, S 2) every 6 months or as instructed by the ECO due to recurring incidents. Adhere to minimum wage (LA, S 10-14). Provide personal protective clothing (HSR, S 210-217).	N/A

		Make provision for first aid and emergency arrangements (HSR, S 228-242).	
<b>Roads</b>	Roads Ordinance 17	Width of proclaimed roads and road reserve boundaries (S3.1) <ul style="list-style-type: none"> <li>▣ Control of traffic on urban trunk and main roads (S27.1)</li> <li>▣ Rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads (S36.1)</li> <li>▣ Infringements and obstructions on and Interference with proclaimed roads. (S37.1)</li> </ul>	Ms. Elina Lumbu Tel: (+264-61) 284 7427 (+264-81) 1465323
<b>Water</b>	Water Resources Management Act of Namibia 2004.  Water Act No. 54 of 1956	Water resources must be managed, developed and protected and conserved (S3) Regulates control and protection of groundwater resources Water Pollution and provision relating to effluent discharge permits (S21) Details specific quantities in term of water quality determinants, which waste water should be treated to before being discharged into the environment	Mr. Witbooi Tel: (+264-61) 208 7226  Ms. Elizabeth Amagola (+264-61) 2087719
<b>Town Planning</b>	Urban and Regional Planning Act 5 of 2018 and its regulations	The proposed use of the project site must be consistent with the Gobabis Town Planning Scheme/zoning.  Section 65 states that subdivision of land situated in any area to which an approved Town Planning Scheme applies must be consistent with that scheme.	Mr. Daniel Nghidinwa (+264-61) 297 2911
<b>Sewerage and Drainage</b>	Local Authorities Act 23 of 1992 (as amended)	Proper construction of pipe lines in drainage lines. Prevention of pollution and environmental damaged caused by improper construction of	Gobabis Municipality

		sewerage and water pipelines.	
<b>Public Health and Safety</b>	Public health Act 36 of 1919	Section 119 stated that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other	Ministry of Health and Social Services

### 3.2 CONSTRUCTION AND TENDER PREPARATION PHASE

The Gobabis Municipality & Block Construction & Stanley Griffiths should ensure that information provided and described below be consulted and carried out whenever a construction tender document is prepared for Portions 148 and 167 of the Farm Townlands of Gobabis No. 114 in the table below:

**Table 4: Construction and Tender Preparation Phase**

EMP implementation	<ul style="list-style-type: none"> <li>• Relevant sections of this Townships EMP should be included in the tender documents for all development so that tenderers can make provision for implementation of the EMP</li> </ul>
Financial provision	<ul style="list-style-type: none"> <li>• Financial provision for the co-opting of a health officer from the Ministry of Health and Social Services to facilitate HIV/AIDS and TB education programmes periodically on site during the construction phase should be included as a cost item within construction tender documents.</li> <li>• Financial provision for the facilitation of an induction programme for all construction personnel as well as subcontractors and associated personnel should be included as a cost item within tenders concerning the construction and/or maintenance of services infrastructure.</li> <li>• Financial provision for the drafting of a Communication Plan should be included as a cost item within construction tender documents.</li> </ul>

### 3.3. CONSTRUCTION PHASE AND MITIGATION MEASURES

The following table provides an overview of the generic and site specific themes and mitigating measures to be implemented as part of the construction component of the EMP to be undertaken within Portions 148 & 167 of the Farm Townlands of Gobabis No. 114.

**Table 5: Generic and site-specific environmental management actions for the construction phase**

THEME	MITIGATING MEASURES
Waste management	Avoid and where possible minimize all pollution associated with construction
Borrow pits	Ensure topsoil protection and post-construction rehabilitation.
Health and safety	Safeguard health and safety of laborers and general
Dust and noise	Avoid and where not possible minimize dust and noise associated with construction
Environmental training and awareness	Awareness creation regarding the provisions of the EMP as well as importance of safeguarding environmental resources.
Environmental conservation	Minimize construction activity footprint and safeguard biodiversity in ecologically sensitive areas.
Employment/ Recruitment (Staff management)	Minimize negative conflict through legal and fair recruitment practices
Stakeholder communication	Provide a platform for stakeholders to raise grievances and receive feedback and hence minimize negative conflict

Socio-economic Miscellaneous	and	Ensure due consideration is given to matters regarding the cultural and general wellbeing of the affected community and matters incidental thereto
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Subsequently the following sections (A – J) details the mitigating measures for each identified theme related to the construction phase of the township establishment of Portions 148 & 167 of the Farm Townlands of Gobabis No. 114.

## SECTION A: WASTE MANAGEMENT

ASPECTS	MITIGATION MEASURE
<b>Waste management plan</b>	The Contractor should compile a Waste Management Plan which should address as a minimum the mitigation measures included below
<b>Hazardous waste</b>	<p>All heavy construction vehicles and equipment on site should be provided with a drip tray.</p> <p>Drip trays are to be transported with vehicles wherever they go.</p> <p>Drip trays should be cleaned daily and spillage handled, stored and disposed of as hazardous waste.</p> <p>All heavy construction vehicles should be maintained regularly to prevent oil leakages.</p> <p>Maintenance and washing of construction vehicles should be take place only at a designated workshop area.</p> <p>The workshop area should be lined with concrete.</p> <p>The workshop should have an oil-water separator for collect run-off from washing.</p> <p>Spilled concrete (wet or dry) should be treated as hazardous waste and disposed of by the end of each day in the appropriate hazardous waste containers.</p> <p>All hazardous substances (e.g. fuel etc) or chemicals should be stored in a specific location on an impermeable surface which is bounded</p>
<b>Sewage and grey water</b>	<p>Do not allow the sewage (black water) to be discharged directly onto open soil.</p> <p>All sewage must be removed regularly and disposed of at a recognized</p>

	<p>(municipal) sewage treatment facility.</p> <p>The water collected from wash basins and showers (grey water), should not be left standing for long periods of time as this promotes mosquito breeding as well as parasite and bacterial proliferation. Grey water should be recycled:</p> <p>Used for dust suppression;</p> <p>Used to water a vegetable garden, or to support a small nursery;</p> <p>Used to clean equipment.</p> <p>If grey water will not be recycled it should be removed along with the black water on a regular basis.</p>
<b>General waste</b>	<p>The construction site should be kept tidy at all times. All domestic and general construction waste produced on a daily basis should be cleaned and contained daily.</p> <p>No waste may be buried or burned.</p> <p>Waste containers (bins) should be emptied regularly and removed from site to a recognized (municipal) waste disposal site.</p> <p>All recyclable waste needs to be taken to the nearest recycling depot.</p> <p>A sufficient number of separate waste containers (bins) for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such.</p> <p>Construction laborers should be sensitized to dispose of waste in a responsible manner and not to litter.</p> <p>No waste may remain on site after the completion of the project</p>
<b>Camp sites</b>	<p>The contractor's camp site shall only be established after permission has been obtained from the Gobabis Municipality.</p> <p>The contractor's staff shall be restricted to the area within the construction site and contractor's camp. Areas outside this designated working zone shall be considered "no go" areas and no construction activities may take place in these areas.</p>

## SECTION B: BORROW PITS

ASPECTS	MITIGATION MEASURE
Topsoil	The Contractor should adhere to prescribed measures emanating from

	<p>the borrow-pit investigation and the design for excavations and disposal of spoil material</p>
Rehabilitation	<p>Upon completion of the construction phase consultations should be held with the local community regarding the post-construction use of the borrow pits.</p> <p>In the event that no post-construction uses are requested, all borrow pits need to be rehabilitated as follows:</p> <p>Borrow pits may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill.</p> <p>Rehabilitated borrow pits need to match the contours of the existing landscape.</p> <p>Also take note of drainage channels in the vicinity of the borrow pit. The rehabilitated area should not be higher (or lower) than a drainage channel. This ensures the efficiency of vegetation reduces the chances of potential erosion.</p> <p>Topsoil is to be spread across borrow pit areas evenly.</p> <p>Deep ripping is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall.</p> <p>Ripping should be done along slopes, not up and down a slope which could lead to enhanced erosion.</p> <p>Rehabilitated borrow pits needs to remain fenced off after the decommissioning of the project to prevent livestock from denuding the newly established vegetation on the area.</p>

### SECTION C: HEALTH AND SAFETY

ASPECTS	MITIGATION MEASURE
HIV/AIDS and TB training	The Contractor should approach the Ministry of Health and Social Services to co-opt a health officer to facilitate HIV/AIDS and TB education programmes periodically on site during the construction phase.
Road Safety	Demarcate roads clearly.

	<p>Off-road driving should not be allowed.</p> <p>All vehicles that transport materials to and from the site must be road worthy.</p> <p>Drivers that transport materials should have a valid driver's license and should adhere to all traffic rules.</p> <p>Loads upon vehicles should be properly secured to avoid items falling off the vehicle.</p>
<p><b>Safety Around Excavated and Work Areas</b></p>	<p>Excavations should be left open for an absolute minimum time.</p> <p>Excavate short lengths of trenches and box areas for services or foundations in such a way that the trench will not be left unattended for more than 24 hours.</p> <p>Demarcate the following areas with danger tape:</p> <p>All excavation works;</p> <p>Soil and other building material stockpiles; and</p> <p>Temporary waste stockpiles</p> <p>Provide additional warning signage in areas of movement and in "no personnel" areas where workers are not active.</p> <p>Borrow pits are to be fenced off with steel wire fencing.</p> <p>Work areas must be set out and isolated with danger tape on a daily basis.</p> <p>All building materials and equipment are to be stored only within set out and demarcated work areas.</p> <p>Only construction personnel will be allowed within these work areas.</p> <p>2 fire extinguishers should be available at fuel storage area and cooking facilities (in the event that migrant workers reside near the construction site)</p> <p>Comply with all mitigation measures laid out in <b>Section A</b> (Waste Management mitigation details)</p>
<p><b>Ablution Facilities</b></p>	<p>Separate temporary ablutions (toilet and shower) should be available for men and women and should clearly be indicated as such.</p> <p>Portable toilets (i.e. easily transportable) should be available within Portions 148 &amp; 167 of the Farm Townlands of Gobabis No. 114 and in</p>



	<p>walking distance.</p> <p>1 Toilet per every 15 users is accepted as the norm where construction is occurring</p> <p>Sewage waste needs to be removed on a regular basis to an approved (municipal) sewage disposal site. Alternatively, pump it into sealable containers and store it until it can be removed.</p> <p>Workers responsible for cleaning the toilets should be provided with latex gloves and masks</p>
<b>Open fires</b>	<p>No open fires may be made anywhere on site.</p> <p>No wood may be collected within or near the project area.</p> <p>The Contractor must supply wood (or other fuel) for cooking or heating purposes.</p>
<b>Others</b>	<p>Dust protection masks should be provided to workers if they complain about dust.</p> <p>Potable water should be provided to workers.</p> <p>No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable).</p> <p>No workers should be allowed to drink alcohol during working hours.</p>

#### SECTION D: DUST AND NOISE

ASPECTS	MITIGATION MEASURE
<b>Dust</b>	A watering truck should be used on gravel roads with the most heavy vehicle movement especially during dry and windy conditions
<b>Noise</b>	Working hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas.

## SECTION E: ENVIRONMENTAL TRAINING AND AWARENESS

ASPECTS	MITIGATION MEASURE
<p><b>Environmental Induction (Training)</b></p>	<p>All construction workers are to undergo environmental induction (training) which should include as a minimum the following:</p> <p>Explanation of the importance of complying with the EMP.</p> <p>Discussion of the potential environmental impacts of construction activities.</p> <p>Employees' roles and responsibilities, including emergency preparedness.</p> <p>Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities.</p> <p>Explanation of the specific mitigation measures within this EMP especially unfamiliar provisions.</p>
<p><b>Environmental Monitoring and auditing</b></p>	<p>The contractor and GM must confirm that all relevant programmes, legislation, laws and policies are adhere to and abided by and that specifications are implemented in an effective and correct manner as per the developed environmental monitoring programmes.</p>

## SECTION F: ENVIRONMENTAL CONSERVATION (CONSTRUCTION AND OPERATIONAL)

ASPECTS	MITIGATION MEASURE
<p><b>Conservation of vegetation</b></p>	<p>Disturbance of areas outside the designated working zone is not allowed.</p> <p>It is the responsibility of the ECO to ensure that no animal (if there's any) is to be killed, trapped, removed or interfered by the Contractor together with his workers (employees).</p> <p>The Contractor must ensure that no domesticated animals are brought along on sight.</p> <p>It is however recommended that, the site be kept tidy and free of rubbish that will attract animals to the site. Rubbish bins must be game proof to avoid attracting scavengers.</p>

	<p>The ECO shall ensure that no animals should be allowed on camp by the Contractor or his workers. Vegetation disturbance and removal must be kept to a minimum and the areas are monitored in order to ensure that areas are exposed for brief of time only.</p> <p>The ECO officer on site mark the protected trees and those that needs permit with a colorful ribbon as sign of no-removal.</p> <p>All invasive plants must be removed from the site, and burned in a controlled environment.</p> <p>Permits for removal of plant listed in the Forestry Act must be acquired if the last option of removing the protected plant is to be exercised.</p> <p>Construction activities must be carefully planned and implemented in such a way that facilitates and aids in the rehabilitation and establishment of plant communities.</p> <p>Excavations must be covered up as soon as possible.</p> <p>No vegetation outside of the demarcated areas may be removed.</p> <p>No major impacts are expected from the proposed development of during the operational phase.</p> <p>The Gobabis Municipality &amp; Block Construction &amp; Stanley Griffiths is advised to keep and maintain indigenous trees that will form part of the development, as some are protected.</p>
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#### SECTION G: EMPLOYMENT/RECRUITMENT

ASPECTS	MITIGATION MEASURE
Legislation	Adhere to the legal provisions in the Labour Act (see <b>Table 3</b> ) for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc) in the Contract.

#### SECTION H: STAKEHOLDER COMMUNICATION

ASPECTS	MITIGATION MEASURE
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<p><b>Communication plan</b></p>	<p>The Contractor or appointed private property Gobabis Municipality the Developers (if applicable) should draft a Communication Plan, which should outline as a minimum the following:</p> <p>How stakeholders, who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records;</p> <p>How these stakeholders will be consulted on an ongoing basis;</p> <p>Make provision for grievance mechanisms – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the even feedback is deemed unsatisfactory.</p>
<p><b>General communication matters</b></p>	<p>The ER in collaboration with the appointed private property Gobabis Municipality &amp; Block Construction &amp; Stanley Griffiths (if applicable) must appoint an ECO to liaise between the Contractor, stakeholders, Gobabis Municipality, and consultants.</p> <p>The appointed Contractor shall appoint a person from the construction team to take responsibility for the implementation for all provisions of this EMP.</p> <p>The Contractor shall at every site meeting report on the status of the implementation of all provisions of the EMP.</p> <p>The Contractor should implement the environmental awareness training as stipulated in <b>Section E</b>.</p> <p>The Contractor must list the stakeholders of the project and their contact details with whom ongoing communication would be required for duration of the contract. This list, together with the Communication Plan must be agreed upon and given to the ER before construction commences.</p> <p>The Communication Plan, once agreed upon by the Gobabis Town Council, shall be binding.</p> <p>All communication with the stakeholders must take place through the ECO.</p> <p>A copy of the EMP must be available at the site office and should be</p>

	<p>accessible to all stakeholders</p> <p>Key representatives from the above mentioned list need to be invited to attend monthly site meetings to raise any concerns and issues regarding project progress.</p> <p>The Contractor should liaise with the Gobabis Municipality &amp; Block Construction &amp; Stanley Griffiths regarding all issues related to community consultation and negotiation before construction commences.</p> <p>A procedure should be put in place to ensure that concerns raised have been followed-up and addressed.</p> <p>All people on the stakeholders list should be informed about the availability of the complaints register in writing by the ER prior to the commencement of construction activities.</p>
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#### SECTION I: SOCIO-ECONOMIC AND MISCELLANEOUS

ASPECTS	MITIGATION MEASURE
Archaeology	<p>Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below:</p> <p>If operating machinery or equipment stop work;</p> <p>Demarcate the site with danger tape;</p> <p>Determine GPS position if possible;</p> <p>Report findings to foreman;</p> <p>Report findings, site location and actions taken to superintendent;</p> <p>Cease any works in immediate vicinity;</p> <p>Visit site and determine whether work can proceed without damage to findings;</p> <p>Determine and demarcate exclusion boundary;</p> <p>Site location and details to be added to the project’s Geographic Information System (GIS) for field confirmation by archaeologist;</p> <p>Inspect site and confirm addition to project GIS;</p> <p>Advise the National Heritage Council (NHC) and request written permission to remove findings from work area; and</p>

	<p>Recovery, packaging and labelling of findings for transfer to National Museum.</p> <p>Should human remains be found, the following actions will be required:</p> <p>Apply the chance find procedure as described above;</p> <p>Schedule a field inspection with an archaeologist to confirm that remains are human;</p> <p>Advise and liaise with the NHC and Police; and</p> <p>Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.</p>
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## SECTION J: OPERATION AND MAINTAINANCE PHASE

The following mitigation measures should be complied with and carried out during any maintenance works associated with the services infrastructure within Portions 148 and 167 of Gobabis as indicated in Table 6.

**Table 6: Operation and maintenance phase**

ASPECTS	MITIGATION MEASURE
EMP implementation	<p>Portions 148 and 167 of the Farm Townlands of Gobabis No. 114</p> <p>If any construction is to be conducted as part of maintenance works for the services infrastructure within Portion 148 and 167 of the Farm Townlands of Gobabis No. 114. (Please refer to the construction mitigation measures of the Township EMP.</p>
Sewage pipelines	<p>Regular maintenance and monitoring of sewage pipelines and leakages should be undertaken to detect and prevent water contamination.</p>
Post-construction usage	<p>Borrow pits to be utilized post-construction should adhere to the same topsoil and rehabilitation measures outlined within construction mitigation measures of this EMP above.</p>
Post-construction environmental training and awareness	<p>All contractors appointed for maintenance work on the respective services infrastructure must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable</p>

	to their respective work.
Monitoring	Gobabis Municipality & Block Construction & Stanley Griffiths should develop a debt monitoring and collection system to address the potential impacts residents defaulting on water and electricity bills.